

**RELIEF REQUESTED  
WITHOUT A HEARING**

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MAINE

In re: )  
)  
Todd R. Rich ) Chapter 7, Case No. 12-20075  
Melissa J.P. Cleaves )  
)  
Debtors )

MOTION TO REOPEN CASE

NOW COME the Debtors, by and through undersigned counsel, and move to reopen the above captioned case, based upon the following:

1. Debtors filed a Petition under Chapter 7 of the United States Bankruptcy Code on January 31, 2012.
2. A discharge was granted to the Debtors on May 9, 2012 and the case was closed on May 14, 2012.
3. Farm Credit of Maine, ACA was listed as a creditor in Schedule F of Debtors' Petition.
4. The Debtors subsequently learned that a Judgment Lien had been filed in the Cumberland County Registry of Deeds by Farm Credit of Maine, ACA on February 15, 2011.

WHEREFORE, the Debtors desire to reopen their bankruptcy case so as to file a Motion to Avoid Lien in connection with pre-petition judgment lien of Farm Credit of Maine, ACA.

Dated at Windham, Maine this 7<sup>th</sup> day of May, 2015.

/s/ David L. Brandt

David L. Brandt  
Attorney for Debtor  
Bar Registration #3138